

Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, New York, 11427

~~~~~

**Abdul K. Hassan, Esq.**  
Email: [abdul@abdulhassan.com](mailto:abdul@abdulhassan.com)  
*Employment and Labor Lawyer*

Tel: 718-740-1000  
Fax: 718-740-2000  
Web: [www.abdulhassan.com](http://www.abdulhassan.com)

**November 2, 2023**

**Via ECF**

Hon. Edgardo Ramos, USDJ  
United States District Court, SDNY  
40 Foley Square,  
New York, NY 10007

**MEMO ENDORSED**

**Re: Myers v. Life Alert Emergency Response, Inc.**  
**Case No. 23-CV-03609 (ER)(JLC)**  
**Motion for Extension of Time**

Dear Judge Ramos:

My firm represents Plaintiff Anthony Myers ("Plaintiff") in the above-referenced action, and I respectfully write to request a brief one-week extension of the deadline for plaintiff to file his motion for settlement approval to November 8, 2023. We were hoping that his request would not be necessary, but we have not heard back from defense counsel since the last request. Plaintiff has already signed the settlement agreement after it was approved by defense counsel. However, after Plaintiff signed, the Defendant is holding up the process by insisting on an overbroad release that violates *Cheeks*, especially in the context of this case, and which the parties did not agree to. It is my hope that Defendant will avoid further delays and promptly countersign the settlement agreement – that under *Cheeks* and the FLSA when in doubt, leave it out. Two prior requests for an extension of this deadline were made and granted.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510) - *Counsel for Plaintiff*

**cc: Defense Counsel via ECF**

The request is granted. Plaintiff shall file the motion for settlement approval by November 8, 2023. No further extensions will be granted except on good cause shown at an in-person Court conference. SO ORDERED.



Edgardo Ramos, U.S.D.J.  
Dated: November 3, 2023  
New York, New York